

9

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

DAREL T. KING,  
a.k.a. Joffy,

Defendant.

Case: 4:24-cr-20265  
Judge: Behm, F. Kay  
MJ: Ivy, Curtis  
Filed: 05-15-2024  
INDI USA v. KING (tt)

**FILED**  
MAY 15 2024  
U.S. DISTRICT COURT  
FLINT, MICHIGAN

Violations:

18 U.S.C. § 924(j)  
18 U.S.C. § 1951  
18 U.S.C. §§ 1951 and 2  
21 U.S.C. §§ 841(a) and 846  
21 U.S.C. § 841(a)  
18 U.S.C. § 924(c)(1)(A)  
18 U.S.C. § 922(g)(1)

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**INDICTMENT**

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**THE GRAND JURY CHARGES:**

**General Allegations**

At all times material to this indictment:

1. Victim-1 was a resident of Flint, Michigan who sold marijuana, cocaine, and cocaine base, Schedule I and II controlled substances, the sale and robbery of which affects commerce.
2. Victim-2 was a resident of Flint, Michigan.
3. DAREL T. KING was a resident of Flint Township, Michigan.

**COUNT ONE**

**USING AND CARRYING A FIREARM TO COMMIT MURDER DURING AND IN  
RELATION TO A CRIME OF VIOLENCE AND DRUG TRAFFICKING CRIME  
18 U.S.C. § 924(j)**

4. On or about July 10, 2019, in the Eastern District of Michigan, DAREL T. KING knowingly used and carried a firearm during and in relation to a crime of violence and drug trafficking crime for which he may be prosecuted in a court of the United States, that is, interference with commerce by robbery as charged in Count Three and possession with intent to distribute marijuana, cocaine, and cocaine base as charged in Count Five, in violation of Title 18, United States Code, Section 924(c), and in the course of that crime caused the death of a person through the use of a firearm, which killing is murder as defined in Title 18, United States Code, Section 1111(a), namely, DAREL T. KING caused the death of Victim-1 by shooting Victim-1 with a firearm.

In violation of Title 18, United States Code, Section 924(j).

**COUNT TWO**  
**CONSPIRACY TO INTERFERE WITH COMMERCE BY ROBBERY**  
**18 U.S.C. § 1951**

5. Paragraphs 1, 2 and 3 of the general allegations of this Indictment are hereby re-alleged and incorporated by reference.

6. Beginning on a date unknown and continuing until on or about July 10, 2019, in the Eastern District of Michigan, DAREL T. KING and others known and unknown to the Grand Jury knowingly and unlawfully combined, conspired, confederated, and agreed to unlawfully obstruct, delay, and affect commerce, and the movement of articles and commodities in such commerce, by robbery, in that DAREL T. KING and others known and unknown to the Grand Jury conspired to rob Victim-1 of marijuana, cocaine, cocaine base, and the proceeds from the sale thereof, by means of actual and threatened force, violence, and fear of injury.

7. In furtherance of the conspiracy, and to effect the objects thereof, DAREL T. KING and other members of the conspiracy committed the following acts in the Eastern District of Michigan:

a. On or about July 9, 2019, DAREL T. KING travelled to Victim-1's residence in the City of Flint on several occasions in order to purchase marijuana and to conduct reconnaissance.

b. On or about July 10, 2019, DAREL T. KING and members of the conspiracy travelled to Victim-1's residence in the City of Flint in order to rob Victim-1 of marijuana, cocaine, cocaine base, and the proceeds from the sale thereof.

c. On or about July 10, 2019, DAREL T. KING and other members of the conspiracy entered Victim-1's residence, brandished firearms, and demanded drugs, money, and a gun. In the course of the robbery, DAREL T. KING discharged his firearm, shooting and killing Victim-1 and shooting and injuring Victim-2.

In violation of Title 18, United States Code, Section 1951.

**COUNT THREE**  
**INTERFERENCE WITH COMMERCE BY ROBBERY**  
**18 U.S.C. §§ 1951 AND 2**

8. On or about July 10, 2019, in the Eastern District of Michigan, DAREL T. KING and others known and unknown to the Grand Jury, aided and abetted by each other, knowingly and unlawfully obstructed, delayed, and affected commerce, and the movement of articles and commodities in such commerce, by robbery, in that DAREL T. KING and others unlawfully took marijuana, cocaine, cocaine base, and proceeds from the sale thereof, from Victim-1 and against Victim-1's will by

means of actual and threatened force, violence, and fear of injury to Victim-1 and other persons in Victim-1's company.

In violation of Title 18, United States Code, Sections 1951 and 2.

**COUNT FOUR**  
**CONSPIRACY TO POSSESS WITH INTENT  
TO DISTRIBUTE CONTROLLED SUBSTANCES  
21 U.S.C. §§ 841(a)(1) AND 846**

9. Beginning on a date unknown and continuing until on or about July 10, 2019, DAREL T. KING and others known and unknown to the Grand Jury knowingly and intentionally combined, conspired, confederated and agreed to possess with intent to distribute controlled substances, specifically a mixture or substance containing a detectable amount of marijuana, which is a Schedule I controlled substance; a mixture or substance containing a detectable amount of cocaine, which is a Schedule II controlled substance; and a mixture or substance containing a detectable amount of cocaine base, which is a Schedule II controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1) and 846.

**COUNT FIVE**  
**POSSESSION WITH INTENT TO DISTRIBUTE MARIJUANA, COCAINE, AND**  
**COCAINE BASE**  
**21 U.S.C. § 841(a)(1)**

10. On or about July 10, 2019, in the Eastern District of Michigan, DAREL T. KING knowingly and intentionally possessed with the intent to distribute controlled substances, specifically a mixture or substance containing a detectable amount of marijuana, which is a Schedule I controlled substance; a mixture or substance containing a detectable amount of cocaine, which is a Schedule II controlled substance; and a mixture or substance containing a detectable amount of cocaine base, which is a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1) and (b)(1)(C).

**COUNT SIX**  
**USING, CARRYING, BRANDISHING, AND**  
**DISCHARGING A FIREARM DURING AND IN RELATION TO**  
**A CRIME OF VIOLENCE AND A DRUG TRAFFICKING CRIME**  
**18 U.S.C. § 924(c)(1)(A)**

11. On or about July 10, 2019, in the Eastern District of Michigan, DAREL T. KING knowingly used, carried, brandished, and discharged a firearm during and in relation to a crime of violence and drug trafficking crime for which he may be prosecuted in a court of the United States, that is, interference with commerce by

robbery as charged in Count Three and possession with intent to distribute marijuana, cocaine and cocaine base, as charged in Count Five, in violation of Title 18, United States Code, Section 924(c)(1)(A).

**COUNT SEVEN**  
**FELON IN POSSESSION OF AMMUNITION**  
**18 U.S.C. § 922(g)(1)**

12. On or about July 10, 2019, in the Eastern District of Michigan, DAREL T. KING, knowing he had been previously convicted of an offense punishable by a term of imprisonment exceeding one year, knowingly possessed, in and affecting commerce, twelve rounds of 9mm Luger caliber ammunition, in violation of Title 18, United States Code, Section 922(g)(1).

**FORFEITURE ALLEGATIONS**

13. The allegations contained in Counts One, Two, Three, Four, Five, Six, and Seven of this Indictment are hereby re-alleged and incorporated by reference for the purpose of alleging forfeiture. Pursuant to Fed. R. Cr. P. 32.2(a), the government hereby gives notice to the defendant of its intention to seek forfeiture of all proceeds of the alleged violations, direct or indirect, or property traceable thereto; all property

that facilitated the commission of the violations alleged, property involved in, or property traceable thereto, the violations alleged in this indictment.

**THIS IS A TRUE BILL.**

Dated: May 15, 2024

s/GRAND JURY FOREPERSON

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**Companion Case information MUST be completed by**United States District Court  
Eastern District of Michigan**Criminal Case C**Case: 4:24-cr-20265  
Judge: Behm, F. Kay  
MJ: Ivy, Curtis  
Filed: 05-15-2024  
INDI USA v. KING (tt)

NOTE: It is the responsibility of the Assistant U.S. Attorney signing this form to c

<b>Companion Case Information</b>	<b>Companion Case Number:</b>
This may be a companion case based upon LCrR 57.10 (b)(4) <sup>1</sup> :	<b>Judge Assigned:</b>
<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<b>AUSA's Initials: JMD</b>

**Case Title:** USA v. DAREL T. KING a.k.a. Joffy**County where offense occurred :** GENESEE**Check One:** ☒ **Felony** ☐ **Misdemeanor** ☐ **Petty**

☐ Indictment/ ☐ Information --- no prior complaint.

☒ Indictment/ ☐ Information --- based upon prior complaint [Case number: 23-mj-30117]

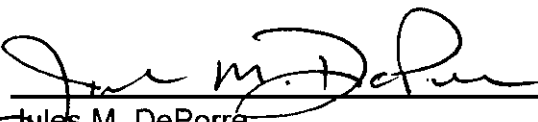
☐ Indictment/ ☐ Information --- based upon LCrR 57.10 (d) [Complete Superseding section below].

**Superseding Case Information****Superseding to Case No:** \_\_\_\_\_ **Judge:** \_\_\_\_\_

- ☐ Original case was terminated; no additional charges or defendants.
- ☐ Corrects errors; no additional charges or defendants.
- ☐ Involves, for plea purposes, different charges or adds counts.
- ☐ Embraces same subject matter but adds the additional defendants or charges below:

**Defendant name****Charges****Prior Complaint (if applicable)****Please take notice that the below listed Assistant United States Attorney is the attorney of record for the above captioned case.**May 15, 2024

Date



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P73999

<sup>1</sup> Companion cases are matters in which it appears that (1) substantially similar evidence will be offered at trial, (2) the same or related parties are present, and the cases arise out of the same transaction or occurrence. Cases may be companion cases even though one of them may have already been terminated.